

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

MOVE TEXAS CIVIC FUND; )  
JOLT INITIATIVE; )  
LEAGUE OF WOMEN VOTERS )  
OF TEXAS; and TEXAS STATE )  
CONFERENCE OF NAACP UNITS )  
 )  
Plaintiffs, )  
 )  
v. ) Case No. 3:19-cv-00041  
 )  
DAVID WHITLEY, Texas Secretary of State, )  
in his official capacity; KEITH INGRAM, )  
Texas Director of Elections, in his official )  
capacity; CHERYL JOHNSON, Voter )  
Registrar for Galveston County, in her official )  
capacity; PAMELA OHLENDORF, Elections )  
Administrator for Caldwell County, in her )  
official capacity; KIRSTEN SPIES, Tax )  
Assessor and Voter Registrar for Blanco )  
County, in her official capacity; TERRI )  
HEFNER, Elections Administrator for Fayette )  
County, in her official capacity; )  
BETH ROTHERMEL, County Clerk )  
and Voter Registrar for Washington County, )  
in her official capacity. )  
 )  
Defendants. )

---

**DECLARATION OF GRACE CHIMENE**

My name is Grace Chimene. I am over the age of 18 and capable of making this declaration. The facts stated herein are within my personal knowledge.

1. I am the President of the League of Women Voters of Texas (“the League”).

Case 3:19-cv-00041 Document 10-3 Filed in TXSD on 02/06/19 Page 2 of 6

2. The League is a non-profit organization with its main offices in Austin, Texas.
3. The League is a non-partisan organization whose mission includes empowering voters, defending democracy and envisioning a democracy where every person has the desire, the right, the knowledge and the confidence to participate.
4. The League has chapters in 31 Texas counties and 2700 individual members all across the state, including in Galveston and Caldwell Counties.
5. The League's membership includes individuals who are naturalized citizens.
6. In fulfilling our mission, members of the League register voters across the state of Texas.
7. The League's voter registration efforts include having its members attend naturalization ceremonies in order to register newly naturalized citizens.
8. The League uses its time and resources to help facilitate its members' registration activities, including registering individuals at naturalization ceremonies.
9. The League believes that the Secretary of State's actions in issuing his Advisory and the counties' actions in following up on this Advisory pose a great risk of undoing the work the League has done in registering newly naturalized citizens.

10. The League believes that registering new citizens at naturalization ceremonies should be a celebration of our democracy. The Secretary's actions frustrate our work to ensure these citizens have the desire, the right, the knowledge and the confidence to participate in our democracy.
11. When the League first heard about the Secretary's Advisory, the organization immediately began spending time and energy trying to understand its impact on our work.
12. The League put together and issued a press release in response to the Secretary's Advisory.
13. On January 28, 2019, the League and other non-profit organizations issued a letter to the Secretary of State that detailed potential problems with the Secretary's Advisory.
14. On January 28, 2019, I, in my capacity as the League's President, gave an interview to National Public Radio discussing the problems with the Secretary's actions and his Advisory.
15. On January 31, 2019, the League, along with the other non-profit organizations, issued a follow-up letter to the Secretary of State due to the lack of a satisfactory response to our first letter.

16. The League has been providing information directly to its chapters and members to update them on the current state of the Advisory and on what actions individual counties are taking in regards to the Advisory.

17. On February 4, the League issued its monthly newsletter. We had to significantly alter plans for the newsletter in order to address the Secretary's actions.

18. In order to stay up to date on latest situation, the League has been continuously monitoring developments related to the Secretary's Advisory.

19. I estimate that I have spent approximately 30 hours dealing with fallout from the Advisory, and I estimate that our Voting Rights and Election Law Issue Chair has spent 30-40 hours dealing with fallout from the advisory. This includes responding to inquiries from media and from the public, and formulating strategies for what steps we want to take in response to the Advisory.

20. Dealing with the fallout from the Advisory has taken away substantial time and resources from other League activities.

21. February 4 is our Make Democracy Work dinner, which is our only annual fundraising dinner. It is a major event for the League, as we are a volunteer-based organization and have limited resources. We count on this dinner to provide funding for our activities throughout the year.

22. February 4 and 5 are also our lobby days, in which members of the League come to Austin to meet with State Representatives and Senators and advocate for the League's legislative agenda. Preparing for a large volunteer event like this takes countless hours.
23. The Advisory has also taken time away from planning for our upcoming state board meeting.
24. We are spending time and resources formulating strategies for how the Advisory will affect our ongoing efforts to register voters at naturalization ceremonies.
25. In our voter registration and civic engagement activities, if we come across naturalized citizens who might have been affected by the Advisory, we will have to take steps to help them ensure that they remain registered to vote, or we will have to re-register them if their registration was cancelled.
26. If the Advisory is not rescinded, we will need to significantly adjust our plans for voter engagement. Any time we spend re-registering naturalized citizens or counseling concerned naturalized citizens about the purge lists is time that we could otherwise spend registering more voters.
27. We are a volunteer-based group with extremely limited resources, and any time and funds that are spent dealing with this Advisory now, and in the future if it remains in place, are resources that would otherwise go towards

accomplishing our primary mission. This will detract from our normal voter registration, voter education, get-out-the-vote, and election protection efforts surrounding local, state and federal elections across Texas. The drain on our resources away from these efforts is particularly costly in the crucial period leading up to an election—including the upcoming May 4, 2019 election—when these efforts are most useful to the communities we serve.

This Declaration is made pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct.

  
Grace Chimene  
Grace Chimene  
President, League of Women Voters of  
Texas